

Sim Gill (Utah Bar No. 6389)  
DISTRICT ATTORNEY FOR SALT LAKE COUNTY  
Joshua K. Peterman (Utah Bar No. 10248)  
Victoria Turner (Utah Bar No.13388)  
Office of the Salt Lake County District Attorney  
35 East 500 South  
Salt Lake City, Utah 84111  
Telephone: 385.468.7700  
E-mail: [jpeterman@slco.org](mailto:jpeterman@slco.org)  
[vturner@slco.org](mailto:vturner@slco.org)

*Attorneys for Defendant Salt Lake County and  
the Salt Lake County Sheriff's Office*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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STEPHANIE D. ALLEN,

Plaintiffs,

vs.

SALT LAKE COUNTY; SALT LAKE  
COUNTY SHERIFF'S OFFICE, a political  
subdivision, BRANDON HARTLEY, as  
Sheriff of Salt Lake County,

Defendants.

NOTICE OF REMOVAL TO  
FEDERAL COURT

Case No. 2:22-cv-705

Judge

Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendants, by and through their counsel, hereby give NOTICE OF REMOVAL of the civil action pending against them in the Third Judicial District Court in and for Salt Lake County, State of Utah, *Stephanie D. Allen v. Salt Lake County, et al.*, Case No. 220906186, to this Court. The grounds for removal are as follows:

1. This action was commenced by the filing of a Complaint in the Third Judicial District in and for Salt Lake County, State of Utah on October 13, 2022. A copy of the Third District Court

case 220906186 docket, Complaint, and Plaintiff's Exhibit List for the Complaint, are attached hereto as Exhibit A.

2. Plaintiff's Complaint contains claims against Defendants for alleged violations of civil rights under 42 U.S.C. § 2000e, et seq.

3. Based on Plaintiff's allegation of civil rights violations under 42 U.S.C. § 2000e, et seq., this Court has original jurisdiction of the above-entitled action pursuant to 28 U.S.C. § 1331 and this action may be removed to this Court pursuant to 28 U.S.C. § 1441.

4. Removal of this action is timely. Defendant was served the complaint on October 18, 2022. However, Brandon Hartley has not been served pursuant to Rule 4(d) of the Utah Rules of Civil Procedure. Less than thirty (30) days have elapsed since that time.

5. Written notice of this removal is being served this date on counsel for Plaintiff.

6. A true and correct copy of this Notice of Removal is being filed this date with the Clerk of the Third Judicial District Court, in and for Salt Lake County, State of Utah.

WHEREFORE, Defendants hereby submit notice that the above-entitled matter is removed from the Third Judicial District Court in and for Salt Lake County, State of Utah, to the United States District Court for the State of Utah, Central Division, in accordance with the provisions of 28 U.S.C. § 1446.

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Dated this 7th day of November 2022.

Sim Gill  
SALT LAKE COUNTY DISTRICT ATTORNEY

/s/ Victoria Turner  
Joshua K. Peterman  
Victoria Turner  
Deputy District Attorneys  
*Counsel for Defendant Salt Lake County and  
the Salt Lake County Sheriff's Office*

### **CERTIFICATE OF SERVICE**

I certify that on the 7th day of November 2022, a true and correct copy of the foregoing **Notice of Removal to Federal Court** was electronically filed with the Clerk of the Court, utilizing the Court's CM/ECF electronic filing system which automatically sent notice to the following:

Jaren C. Sandberg  
Tyler T. Todd  
We Win Injury Law  
Park Todd, PLLC  
1173 South 250 West, Ste. 311  
St. George, UT 84770  
[jaren@wewillinjurylaw.com](mailto:jaren@wewillinjurylaw.com)  
[tyler@wewininjurylaw.com](mailto:tyler@wewininjurylaw.com)  
*Attorney for Plaintiff, Stephanie D. Allen*

/s/ Iris Pittman

Paralegal